

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ICONTROL NETWORKS, INC., a Delaware corporation,

Plaintiff,

v.

ZONOFF INC., a Delaware corporation,

Defendant.

CIVIL ACTION

NO. 1:14-CV-1199-GMS

**STIPULATION REGARDING AGREED CLAIM CONSTRUCTION TERMS**

Pursuant to the Court's instruction at the March 14, 2016 Claim Construction hearing, Plaintiff Icontrol Networks, Inc. ("Icontrol") and Defendant Zonoff Inc. ("Zonoff") jointly submit this stipulation regarding the parties' agreed constructions for certain of the patents-in-suit, U.S. Patent Nos. 7,262,690 (the "'690 patent"), 8,335,842 (the "'842 patent"), and 8,638,211 (the "'211 patent").

**AGREED CONSTRUCTIONS**

Term	Construction	Pat. (cl.)
"autonomous network"	network which operates independently	'842 (1, 14)
"the gateway selectively forming"	term does not require construction	'842 (1, 14)
"monitoring station"	remote monitoring station located remote of the control unit	'690 (1, 2, 11 <sup>1</sup> )

<sup>1</sup> The parties have diligently and in good faith worked to limit the number of claims at issue in this case. The parties currently have a dispute regarding whether one additional claim (claim 11 of the '690 patent) can be asserted in this case. The parties will continue to meet-and-confer on this issue. This stipulation is without prejudice to the right of either the plaintiff or defendant to seek to add or seek to oppose the addition of this additional claim.

“zone”	grouping based on location of one or more security sensors within the premises	’211 (1)
“identification of a zone function”	identification of the behavior of the zone	’211 (13)
“uplink connections”	a communications link from a gateway to a server	’842 (1, 14)
“assigned server address”	address of a server that is assigned to the gateway	’842 (1, 14)

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SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_ 2016.

\_\_\_\_\_  
U.S. District Judge